



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

RECEIVED
SDNY PRO SE OFFICE
2022 NOV 16 PM 4:11

-----X

_____ Civ. _____ ()

W. ASHWOOD KAVANNA

PLAINTIFF,

COMPLAINT

- **Against** -

(No Jury Trial requested)

Dana Lawro, a/k/a Dania Lawro (“Lawro”),

Sue Hrib, a/k/a CEO “Aunt Sue” of Atlanta Music Fund for Hip-Hop Rappers

(“Aunt Sue”),

Ukrainian American Youth Assoc (“UAYA”) operated by and doing business as CYM.org,
under the laws of New York State; and,

Ukraine American Youth Association (CYMA), Ellenville Camp is incorporated under the
laws of the state of New York And has its principal place of business in New York State and;

Atlanta Music Fund, LLC., AGeorgia Domestic Limited Company; and,

Hotel Edison, 248 West 57th Street, New York, New York

DEFENDANTS,

I. BASIS FOR JURISDICTION: Diversity of Citizenship

The Plaintiff, W. Ashwood Kavanna, is a citizen of the State of New York,

The Defendant, Aunt Sue Hrib, is a citizen of the State of Georgia,

The Defendant, Dana Lawro, aka Dania Lawro, is a citizen of State of New York,

The Defendants, Ukraine American Youth Association (“CYMA”) are located in the State of New York

The Defendant Ukraine American Youth Association (“CYMA”) Ellenville Camp is incorporated under the laws of the state of New York And has its principal place of business on the State of New York, and;

Atlanta Music Fund, LLC., Atlanta Georgia Domestic Limited Company

II. PARTIES:

A. Plaintiff Information

W. Ashwood Kavanna, 425 Main Street, New York County, New York
10044, telephone: 646.687.1377,
Email address: ASHWOODART@Gmail.com

B. Defendant Information

Defendant #1 Dania Lawro, a/k/a Dana Lawro,

CURRENT JOB TITLE:does business as Co-Chr of “Hearts of Blue & Gold
Gala” CYMA,

CURRENT ADDRESS:whose principal place of business is at 136 Second
Avenue, #201, New York, NY, 10003; and,

8853 U.S.Rt # 209, Ellenville, New York 12428, tele: 646.823.7910

Defendant #2 Aunt Sue Hrib,

CURRENT JOB TITLE:does business as Co-Chr of “Hearts of Blue & Gold
Gala” CYMA, and manager of “RAP” performers as CEO , Atlanta Music
Fund, LLC. A Georgia Domestic Company

CURRENT ADDRESS: whose principal place of business is 1900 Exchange
Bldg #200, Atlanta ,Georgia 03339, tele: 770.331.0220; and,

Defendants # 3 and #4 (are affiliates): TheUkraine American Youth Association
(CYMA) andUkraine American Youth Association (CYMA), Ellenville Campare
incorporated under the laws of the state of New YorkAnd has its principal place of
business in the State of New Yor

CURRENT ADDRESS: at 136 Second Avenue, #201, New York, NY, 10003; a
8853 U.S.Rt # 209, Ellenville, New York 12428, tele: 646.823.7910; and,

Defendant #5: Atlanta Music Fund, LLC., Georgia Domestic Limited Company

CURRENT ADDRESS: 1900 Exchange Bldg #200, Atlanta, Georgia 30339,

Defendant #6: Hotel Edison, 248 West 47th Street, New York, New York

1. **FACTS:** The Defendants are promoters / producers of the BLUE & GOLD GALA at Hotel Edison, November 19, 2022 (the “Event”) for which they contracted with Plaintiff to auction / sell his original art , entitled, “Artemisia Man-Slams Putin” an approx. 2 ½ X 3 ½ ft painting on canvas by Ashwood Kavanna. (the “Art”), Exh A. who is an artist whose works has exhibited in The Whitney Museum of American History (NYC), the Tate, (England), the Kunsthalle Schirn Museum (Frankfurt, Germany), the Kunsthalle Wien Museum (Vienna, Austria) and elsewhere, such as his 6ft tryptic adorns the lobby of the Fountain House world headquarters, NYC, NY , a world health organization with 208 branch affiliates worldwide.
2. Defendants requested and directed that artist alter & change the painting significantly and promote the event in the media, which Plaintiff – Artist has complied with by contacting:

I) New York Post, Ii) The London Daily Mail, Ii) The New York Law Journal; and, Iv) The Fountain House Times, a weekly newspaper (“FH Times ”).

All of which the artist proceeded to do in reliance upon Defendants representations and directives, as a part of the contract.

3. In reliance, The Fountain House News published a feature article entitled, dated November 11, 2022, with a picture of the Hotel Edison location of the event, to promote the event. Fountain House (“FH”) has 208 branch affiliates worldwide. This publication is seen by donors & board members, many of whom are major community leaders and charitable donors in their respective communities worldwide, not merely in New York City. For example, recently Mrs. Jeff Bezos donated \$20 million and former Mayor Bloomberg donated \$25 million to FH as have numerous other distinguished public figures and celebrities, many of whom are major art collectors. It was awarded the Hilton Award, second only to the Nobel Award in the humanities, among many awards and honors.

4. On or about October 25, 2022 negotiation / conversations ensued between the Plaintiff and Defendant – Co Chr of the event Dania Lawro and Sue Hrib up to and including November 12, 2022, when Defendants unilaterally, without cause nor notice, terminated. During period an agreement was reached whereby Defendant would receive the first TEN THOUSAND (\$10,000) DOLLARS from the proposed auction of the art. This included TWO (2) meetings at artists’ art studio on Roosevelt Island, NYC on November 4, 2022 attended by Dania Lawro, Iryna Lawro and Army Retird Capt. Phillip A. Karber, together with Plaintiff and his assistant Angelina Oujegova, at which meeting Defendants were shown the art and signed a Confidentiality Agreement. At this meeting all agreed to go forward with the sale of the art at the Gala by auction; shook hands and hugged. All parties signed a Confidentiality Agreement witnessing the substance of the deal.

5. There can be no doubt irreparable harm will result to the artist (me), with no other remedy available, where a painting is dropped and excluded from this event with no explanation. Moreover, this art is very provocative for it depicts the decapitation of Premiere Putin, at a time of war in the Ukraine. It was dropped only after media due diligence inquiry of who is the sponsoring promoter. I then learned Sue Hrib calls herself notorious “Auntie” as the Atlanta Music Fund, LLC. promoting hip hop rap and has declared bankruptcy as Blue Horizon, USA, Inc fed case #12-54849; pet # 11-CV-0609-JH).

INJURIES: Irreparable ongoing damage to Plaintiff reputation and his art, for which there is no other available remedy but to halt the continued embarrassment, insult and harm resulting at the event.

III. RELIEF:

Therefore, this court must enjoin the event from proceeding without Plaintiff art and impound gross ticket sales..

V. PLAINTIFF'S CERTIFICATION AND WARNINGS

By signing below, I certify to the best of my knowledge, information, and belief that: (1) the complaint is not being presented for an improper purpose (such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation); (2) the claims are supported by existing law or by a nonfrivolous argument to change existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Federal Rule of Civil Procedure 11.

I agree to notify the Clerk's Office in writing of any changes to my mailing address. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Each Plaintiff must sign and date the complaint. Attach additional pages if necessary. If seeking to proceed without prepayment of fees, each plaintiff must also submit an IFP application.

NOV 16, 2022
 Dated
Wm. Ashwood
 First Name Middle Initial Last Name
425 MAIN ST.
 Street Address
N.Y.
 County, City
646-687-1377
 Telephone Number
W. Ashwood
 Plaintiff's Signature
KAVANNA
 Last Name
N.Y.
 State
10044
 Zip Code
ASHWOOD ART @ G-mail.com
 Email Address (if available)
Karen Faust
 KAREN FAUST
 Notary Public, State of New York
 Registration No. 01FA6043887
 Qualified in New York County
 Commission Expires June 26, 2026

I have read the Pro Se (Nonprisoner) Consent to Receive Documents Electronically:

☐ Yes ☐ No

If you do consent to receive documents electronically, submit the completed form with your complaint. If you do not consent, please do not attach the form.